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February 18, 2004

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Portals  
Washington, DC 20554

**Re: Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Verizon Petition for Forbearance from Application of Section 271 – CC Docket No. 01-338; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 - CC Docket No. 96-98; Deployment of Wireline Services Offering Advanced Telecommunications Capability – CC Docket No. 98-147**

Dear Ms. Dortch:

On February 17, 2004, representatives from Verizon participated in a series of meetings with FCC staff members to discuss the company's plans for deployment of fiber to the premises. The attached handout covers the major points of discussion.

Meeting details:

Richard Ellis, Jerome Holland, and Ann Rakestraw of Verizon met with Jessica Rosenworcel of the FCC.

Dolores May, Jerome Holland, and Edward Shakin of Verizon met with Scott Bergmann of the FCC.

Richard Ellis, Jerome Holland, Scott Randolph, and Ann Rakestraw, of Verizon met with Pamela Arluk, Michelle Carey, Jeffrey Carlisle, William Maher, and Rob Tanner of the FCC.

If you have any questions about this matter, please do not hesitate to contact me on 202-515-2534.

Sincerely,

A handwritten signature in black ink, reading "Richard Telli". The signature is written in a cursive style with a large, stylized "R" and "T".

cc: P. Arluk  
S. Bergmann  
M. Carey  
J. Carlisle  
W. Maher  
J. Rosenworcel  
R. Tanner



# ***FTTP Overview***

## ***February 17, 2004***

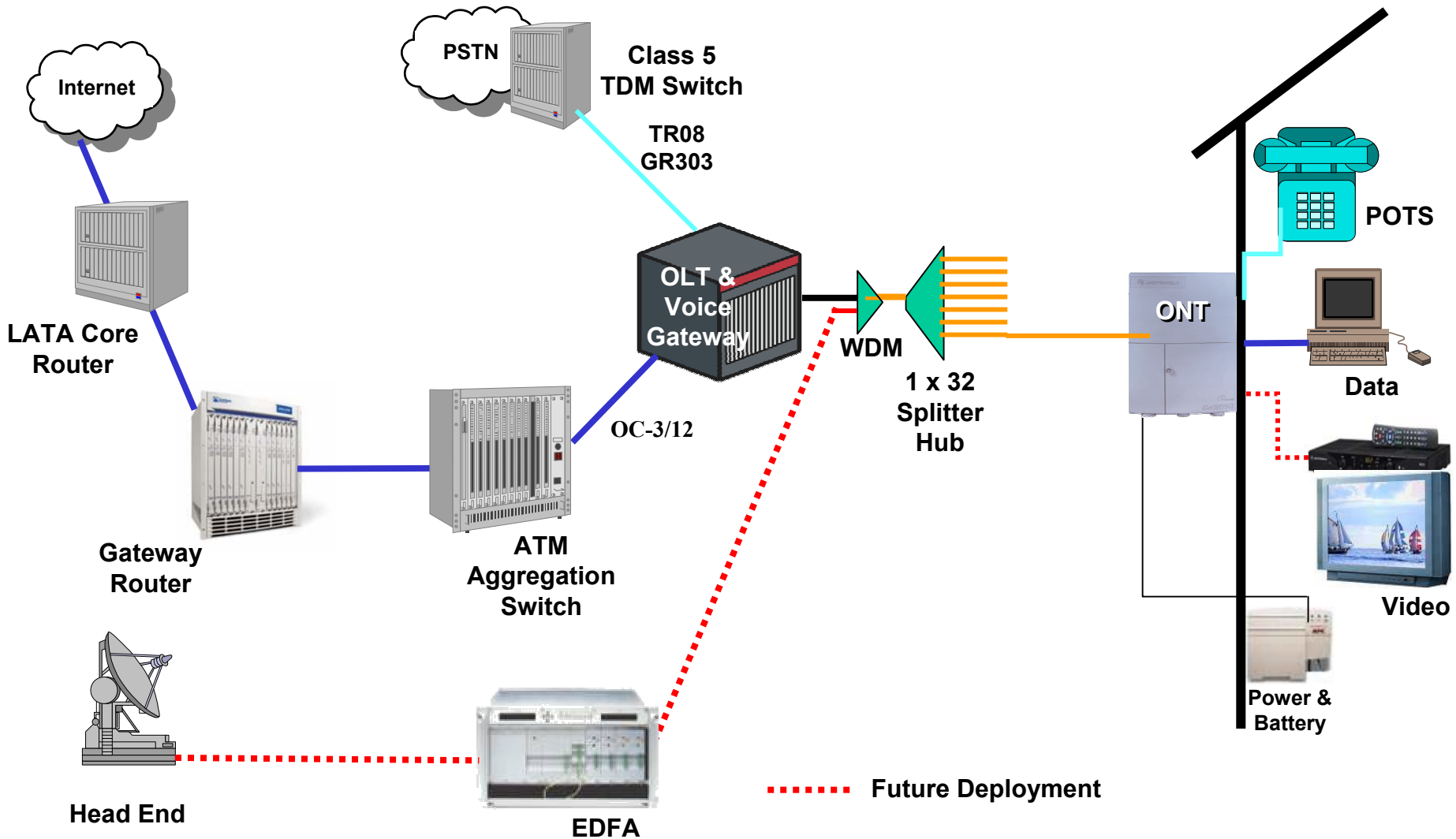
## ***Promise of FTTP Means ...***

- ✓ **A New Customer Experience**
- ✓ **New Products**
- ✓ **New Processes & Systems**
- ✓ **A New Network**

# FTTP Reference Architecture



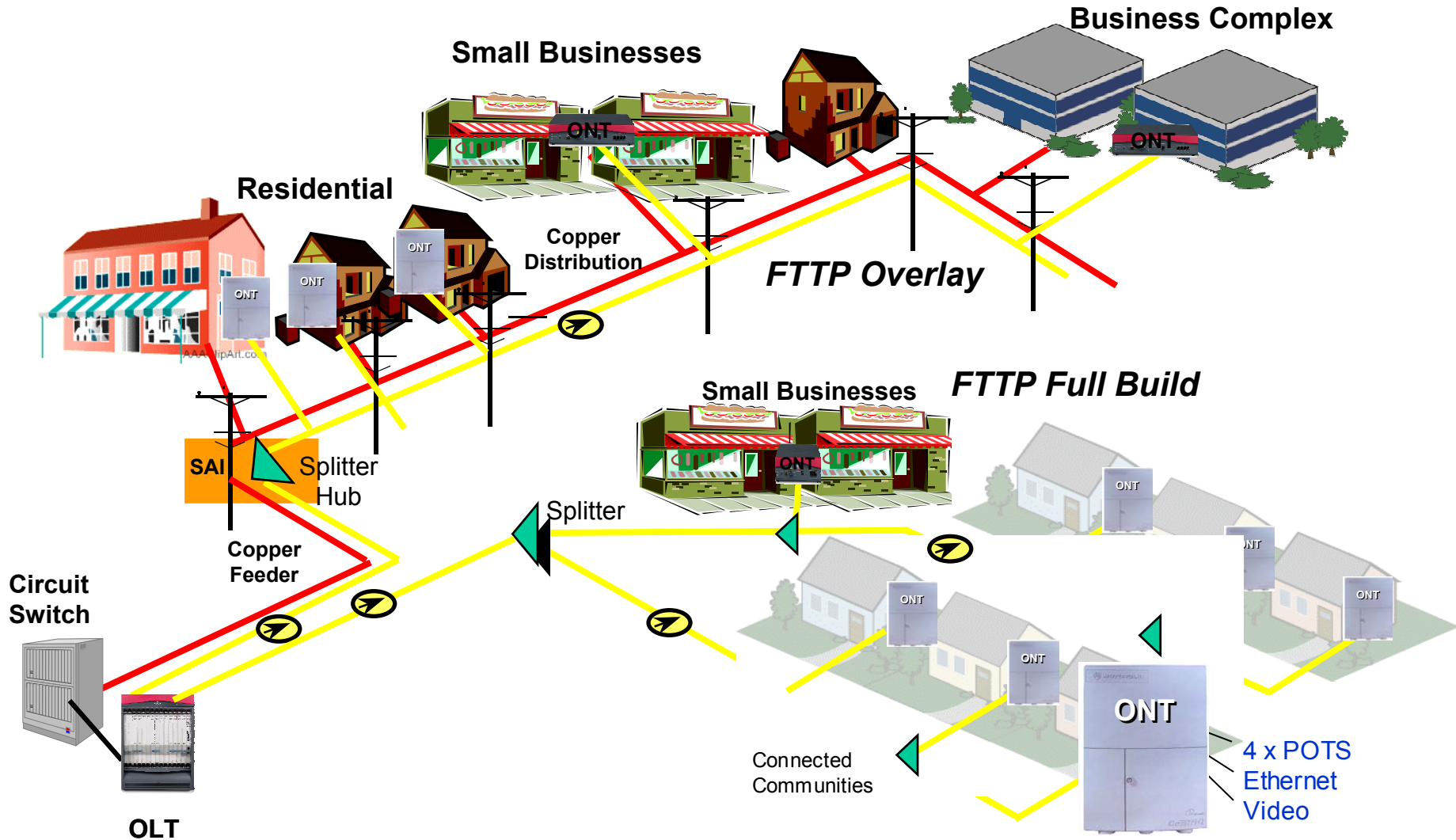
Fiber to the Premises



# FTTP Full Build & Overlay Architectures



Fiber to the Premises



## ◆ 2004 Goals

- ✓ Pass 1M Households
  - Objective is substantial coverage within 5 years
- ✓ Build out 100 Central Offices in 9 States

# *The Promise of FTTP is Based on ...*



Fiber to the Premises

## *... the Following Assumptions:*

- ✓ **No unbundling requirements for the FTTP Network, including no separate FTTP unbundling obligations under Section 271.**
- ✓ **Deployment of FTTP fiber to Multi-unit premises will be treated like other FTTP locations, regardless of who owns intrabuilding copper wiring.**
- ✓ **A clear definition of a “mass market” customer exists.**
  - Suggestion: Mass market = any customer with up to 48TNs.



# *The Basis for These Assumptions:*



Fiber to the Premises

- ✓ **No unbundling requirements for the FTTP Network**
  - Distribution and feeder network is a complete overbuild (Where copper already exists).
  - Do not know how to unbundle FTTP passive optical network.
- ✓ **Multi-unit premises treated like other FTTP locations**
  - Many MUPs are treated same as single-family units for network creation today.
  - Will still provide access to copper intrabuilding cabling owned/controlled by ILEC.
- ✓ **A clear definition of a “mass market” customer**
  - *No operational definition exists today.*
  - *48 TNs is a reasonable breakpoint (equiv. of approx. two DS-1's)*